

Hon. Robert J. Bryan

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

LAWRENCE HARTFORD; DOUGLAS
MITCHELL; BRETT BASS; SPORTING
SYSTEMS VANCOUVER, INC.; SECOND
AMENDMENT FOUNDATION; AND
FIREARMS POLICY COALITION, INC.,

Plaintiffs,

v.

BOB FERGUSON, in his official capacity as
Washington State Attorney General; JOHN R.
BATISTE, in his official capacity as Chief of the
Washington State Patrol; JOHN GESE, in his
official capacity as Sheriff for Kitsap County,
Washington; CLAYTON MYERS, in his official
capacity as Sheriff for Kittitas County,
Washington; JOHN HORCH, in his official
capacity as Sheriff for Clark County,
Washington; ADAM FORTNOY, in his official
capacity as Sheriff for Snohomish County,
Washington; CHAD M. ENRIGHT, in his
official capacity as County Prosecutor for Kitsap
County, Washington; GREG ZEMPEL, in his
official capacity as County Prosecutor for
Kittitas County, Washington; TONY GOLIK,
in his official capacity as County Prosecutor for
Clark County, Washington; and JASON
CUMMINGS, in his official capacity as County
Prosecutor for Snohomish County, Washington,

Defendants.

No. 3:23-cv-05364-RJB

DECLARATION OF
BRANDON COMBS
IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION

1 I, Brandon Combs, declare as follows:

2 1. I make this declaration in support of my Motion for Preliminary Injunction. I am
3 over the age of 18, have personal knowledge of the matters stated herein and, if called upon, I could
4 and would competently testify thereto.

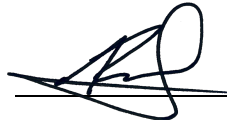
5 2. I am the President of Firearms Policy Coalition, Inc.

6 3. Firearms Policy Coalition is a nonprofit organization that seeks to defend and
7 promote the People's rights—especially the fundamental, individual Second Amendment right to
8 keep and bear arms—advance individual liberty, and restore freedom.

9 4. Firearms Policy Coalition has members in Washington, including the named
10 Plaintiffs, and brings this action to vindicate the rights of its members.

11 5. I am prepared to testify to the foregoing at trial of this matter.
12 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury of the laws of the United States
13 that the foregoing is true and correct.

14 Signed this 3rd day of May, 2023, at Clark County, Nevada.

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17 Brandon Combs
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